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8 ATTORNEYS FOR
9 Mary Wang Oskamp
10

11 UNITED STATES BANKRUPTCY COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14

15 (San Francisco Division)

16 In re:) Case No. 14-31049
17)
18 CHENG-YI WANG and CHING-YI) CHAPTER 13
19 WANG,)
20 Debtors.) **NOTICE OF MOTION FOR RELIEF**
21) **FROM STAY**
22)
23) Hearing Date: September 4, 2014
24) Hearing Time: 9:30 a.m.
25) Judge: Hon. Dennis Montali
26) U.S.B.C.
27) 235 Pine St., 23rd FL.
28) San Francisco, CA 94104

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31 **TO THE HONORABLE DENNIS MONTALI, THE OFFICE OF THE UNITED STATES**
32 **TRUSTEE, CHAPTER 13 TRUSTEE, THE DEBTORS CHENG-YI WANG and CHING-YI**
33 **WANG AND THE ATTORNEY(S) FOR THE DEBTORS, JP MORGAN CHASE, ALL**
34 **INTERESTED PARTIES, AND ALL PARTIES ENTITLED TO NOTICE:**

35 PLEASE TAKE NOTICE that on September 4, 2014 at 9:30 a.m. or as soon thereafter
36 as the matter may be heard before the Honorable Dennis Montali of the United States
37 Bankruptcy Court located at 235 Pine St., 23rd Fl., San Francisco, CA 94104, secured creditor
38 Mary Wang Oskamp (“Oskamp” or “Moving Party”) will move this court for relief from stay

1 pursuant to 11 U.S.C. 105, 362 (d)(1) and 362 (d)(4)(B) of the United States Bankruptcy
2 Code, Rule 4001 of the Federal Rules of Bankruptcy Procedure, and Bankruptcy Local Rule
3 4001-1 of the United States Bankruptcy Court for the Northern District of California with
4 respect to real property commonly known as 1270 Millbrae Ave., Millbrae, CA 94030
5 (APN# 024-211-300-9) ("Real Property") so Moving Party may proceed to exercise her
6 rights and remedies under the note(s), deed(s) of trust, and state law and recovery possession,
7 including but not limited to foreclosure ("Motion").

8 PLEASE TAKE FURTHER NOTICE that Moving Party also seeks an order waiving
9 the fourteen (14) day stay of any order granting relief from stay and/or the Motion as
10 provided by Rule 4001 (a)(3) of Federal Rules of Bankruptcy Procedure.

11 PLEASE TAKE FURTHER NOTICE that Moving Party also seeks that any order
12 granting relief from stay and/or the Motion provide that relief from the stay under 11 U.S.C.
13 362 shall be binding and effective and shall supercede any subsequently entered order
14 confirming a plan of reorganization, conversion, and/or dismissal of the case.

15 PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Local Rule 4001-1
16 of the United States Bankruptcy Court for the Northern District of California the Debtor is
17 advised to appear personally or through counsel at the hearing on the Motion.

18 The Motion is based upon this notice of motion, the supporting motion and/or
19 memorandum of points and authorities filed concurrently herewith, the Declaration of Mary
20 Wang Oskamp filed concurrently herewith, the relief from stay cover sheet filed concurrently
21 herewith, and any and all papers and pleadings on file in this case, including, but not limited
22 to, Debtor's petition and schedules.

23 Dated: August 20, 2014

Campeau Goodsell Smith.
/s/William J. Healy, Esq.
William J. Healy, Esq.